

**UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

|                               |   |                       |
|-------------------------------|---|-----------------------|
| DORIS ANDREWS, as guardian of | ) |                       |
| DAMASCO RODRIGUEZ, disabled,  | ) |                       |
|                               | ) |                       |
| Plaintiffs,                   | ) | No. 08 C 554          |
|                               | ) |                       |
| vs.                           | ) | Judge Guzman          |
|                               | ) | Magistrate Judge Keys |
| CITY OF CHICAGO, et al.,      | ) |                       |
|                               | ) |                       |
| Defendants.                   | ) |                       |

**PLAINTIFF’S AGREED MOTION FOR LEAVE TO FILE *INSTANTER*  
THE ATTACHED FIRST AMENDED COMPLAINT**

NOW COMES Plaintiff, through counsel, and respectfully requests that this Honorable Court grant her leave to file *instante* the attached First Amended Complaint. In support thereof, Plaintiff states as follows:

1. This motion is agreed.
2. This case was originally filed on January 25, 2008.
3. At the time the case was originally filed, the Plaintiff did not know the names of the Defendant-Officers.
4. Through written discovery in this case, Plaintiff’s counsel has discovered the name of the Defendant-Officers.
5. The attached First Amended Complaint adds Officers TIMOTHY MADISON and JOSE OCHOA as Defendants.

WHEREFORE, Plaintiff respectfully requests that this Honorable Court grant her leave to file *instante* the attached First Amended Complaint.

Respectfully submitted,

/s/ Lawrence V. Jackowiak  
*Counsel for the Plaintiff*

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